

FILEDUNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

SEP 10 2020

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STEPHEN JOHNSON,

Defendant.

CRIMINAL NO.

20-1697JBCount 1: 18 U.S.C. § 1153(b) and N.M.
STAT. ANN. § 30-6-1(D): Abuse of a
child;Counts 2 and 3: 18 U.S.C. §§ 1153,
117(a)(1): Domestic Assault by a
Habitual Offender in Indian Country.INDICTMENT

The Grand Jury charges:

Count 1

On or about July 1, 2019, in Indian Country, in Bernalillo County, in the District of New Mexico, the defendant, **STEPHEN JOHNSON**, an Indian, knowingly and recklessly, and without justifiable cause, caused and permitted Jane Doe 1, a child under the age of 18, to be placed in a situation that may have endangered the child's life or health.

In violation of 18 U.S.C. § 1153(b) and N.M. STAT. ANN. § 30-6-1(D).

Count 2

On or about July 1, 2019, in Indian Country, in Bernalillo County, in the District of New Mexico, the defendant, **STEPHEN JOHNSON**, an Indian, and in a role of parent and guardian, assaulted Jane Doe 1, a child, after the defendant had been convicted on at least two separate occasions in Indian tribal court of any offense against a spouse and intimate partner, and against the child of and in the care of the person committing the domestic assault, and if subject to Federal jurisdiction, the offense would be considered an assault, that is:

- (1) Assault on a Household Member, Pueblo of Isleta, CR-DV-0246-2010, September 21, 2010; and
- (2) Assault, Pueblo of Isleta, CR-DV-18-008 & CR-MS-18-0023, March 26, 2018;

In violation of 18 U.S.C. §§ 1153 and 117(a)(1).

Count 3

On or about July 1, 2019, in Indian Country, in Bernalillo County, in the District of New Mexico, the defendant, **STEPHEN JOHNSON**, an Indian, assaulted Jane Doe 2, an intimate partner, after the defendant had been convicted on at least two separate occasions in Indian tribal court of any offense against a spouse and intimate partner, and against the child of and in the care of the person committing the domestic assault, and if subject to Federal jurisdiction, the offense would be considered an assault, that is:

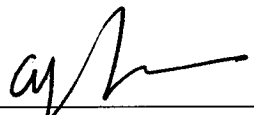
- (1) Assault on a Household Member, Pueblo of Isleta, CR-DV-0246-2010, September 21, 2010; and
- (2) Assault, Pueblo of Isleta, CR-DV-18-008 & CR-MS-18-0023, March 26, 2018;

In violation of 18 U.S.C. §§ 1153 and 117(a)(1).

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY



Assistant United States Attorney
9/9/2020 2:35 PM